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UNITED STATES BANKRUPTCY COURT

SOUTHERN DISTRICT OF NEW YORK

In re

LIBERTY BRIDGE CAPITAL MANAGEMENT
GP, LLC,

Debtor.

Chapter 7

Case No. 20-10009 (SCC)

In re

CASH4CASES, INC.,

Debtor.

Chapter 7

Case No. 20-10010 (SCC)

In re

LIBERTY BRIDGE CAPITAL MANAGEMENT,
IM, LLC,

Debtor.

Chapter 7

Case No. 20-10011 (SCC)

In re

LIBERTY BRIDGE CAPITAL MANAGEMENT,
L.P.,

Debtor.

Chapter 7

Case No. 20-10012 (SCC)

In re

LIBERTY BRIDGE FINCO LLC,

Debtor.

Chapter 7

Case No. 20-10013 (SCC)

In re LIBERTY BRIDGE SETTLEMENT CLEARING, LLC, Debtor.	Chapter 7 Case No. 20-10014 (SCC)
In re DIVERSIFIED PRE-SETTLEMENT PORTFOLIO I, a Series of Liberty Bridge Capital Management, L.P. Debtor.	Chapter 7 Case No. 20-10015 (SCC)
In re DIVERSIFIED PRE-SETTLEMENT PORTFOLIO II, a Series of Liberty Bridge Capital Management, L.P. Debtor.	Chapter 7 Case No. 20-10016 (SCC)

**DEBTORS' MOTION FOR AN ORDER AUTHORIZING AND
DIRECTING THE JOINT ADMINISTRATION OF THE DEBTORS'
CHAPTER 7 CASES PURSUANT TO FED. R. BANKR. P. 1015(b)**

**TO THE HONORABLE SHELLEY C. CHAPMAN,
UNITED STATES BANKRUPTCY JUDGE:**

Debtors Liberty Bridge Capital Management GP, LLC ("LBGP"), Cash4Cases, Inc., Liberty Bridge Capital Management IM, LLC, Liberty Bridge Capital Management, L.P., Liberty Bridge Finco LLC, Liberty Bridge Settlement Clearing, LLC, Diversified Pre-Settlement Portfolio I, a Series of Liberty Bridge Capital Management, L.P., and Diversified Pre-Settlement Portfolio II, a Series of Liberty Bridge Capital Management, L.P., the above-captioned debtors (together collectively, the "Debtors"), by and through their attorneys, Klestadt Winters Jureller Southard & Stevens, LLP, hereby respectfully request the entry of an order authorizing and directing the joint administration of the respective chapter 7 cases for procedural purposes only pursuant to Fed. R.

Bankr. P. 1015(b) (the “Motion”). In support of the Motion, the Debtors respectfully state as follows:

PRELIMINARY STATEMENT

The Debtors are related entities owned, directly or indirectly, by Jaeson Birnbaum. The Debtors are engaged in the business known colloquially as pre-settlement funding, or lawsuit funding, the essence of which is the advancement of funds by the Debtors to litigants in order to provide the litigants with sufficient funds to prosecute their respective case or to pay for medical costs, etc. The Debtors hold collectible assets in the form of their entitlement to litigation recoveries from these various litigants. Given the relationship between the Debtors, the Debtors believe that their Chapter 7 cases would be most efficiently managed through the joint administration of their cases under the lead LBGP case. Accordingly, the Debtors respectfully request that the Court enter an order in substantially the same form as that annexed hereto as Exhibit A, directing the joint administration of their cases.

JURISDICTION

1. The Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A).
2. Venue of this proceeding and this Motion is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.
3. The statutory predicate for the relief requested in this Motion is Rule 1015 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”).

BACKGROUND

4. On January 3, 2020 (the “Petition Date”), each of the above-captioned Debtors filed a voluntary petition for relief under chapter 7 of Title 11 of the United States Code (the

“Bankruptcy Code”) in the United States Bankruptcy Court for the Southern District of New York (the “Court”).

RELIEF REQUESTED

5. By this Motion, the Debtors seek entry of an order authorizing and directing the joint administration of these Chapter 7 cases for procedural purposes only, pursuant to Bankruptcy Rule 1015(b).

BASIS FOR RELIEF REQUESTED

6. Bankruptcy Rule 1015(b) provides that if two or more petitions for relief are pending in the same Court by or against a debtor and its affiliate, the Court may order a joint administration of the estates.

7. As a result of the common ownership interest shared by each of the Debtors, the Debtors are “affiliates” as that term is defined under Section 101(2) of the Bankruptcy Code. Section 101(2) provides that an “entity that directly or indirectly owns, controls, or holds with power to vote, 20 percent or more of the outstanding voting securities of the debtor, other than an entity that holds such securities.” 11 U.S.C. § 101(2)(A). Accordingly, because the Debtors are affiliates, this Court is authorized to grant the relief requested pursuant to Bankruptcy Rule 1015(b).

8. The Debtors believe that joint administration of the Debtors’ chapter 7 cases is warranted because the financial affairs and business operations of the Debtors are closely related. Entry of an order directing joint administration of these cases will avoid duplicative notices, applications and orders, and will thereby save considerable time and expense for the Debtors and result in substantial savings to their estates.

9. Furthermore, the rights of the respective creditors of the Debtors will not be adversely affected by joint administration of these cases because this Motion requests only

administrative consolidation of the estates, and the Debtors are not at this time seeking substantive consolidation. Each creditor may still file a claim against a particular Debtors' estate. Thus, the rights of all creditors will be enhanced by the reduced costs resulting from joint administration. This Court will also be relieved of the burden of entering duplicative orders and maintaining duplicative files. Finally, supervision of the administrative aspects of these chapter 7 cases by the Office of the United States Trustee will be simplified.

10. By reason of the foregoing, the interests of the Debtors, their creditors and equity security holders would be best served by joint administration of the above-captioned cases. Accordingly, the Debtors request that the caption of their cases be modified to reflect the joint administration of the chapter 7 cases under the chapter 7 case with the lowest case number, as follows:

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	
In re	: Chapter 7
	:
LIBERTY BRIDGE CAPITAL MANAGEMENT	: Case No. 20-10009 (SCC)
GP, LLC, <u>et al.</u> , ¹	:
	:
Debtors.	: (Jointly Administered)
-----X	

¹ The Debtors in these cases, along with the last four digits of their federal tax identification numbers are (i) Liberty Bridge Capital Management GP, LLC (9236)(Case No. 20-10009); (ii) Cash4Cases, Inc. (8244)(Case No. 20-10010); (iii) Liberty Bridge Capital Management IM, LLC (2955)(Case No. 20-10011); (iv) Liberty Bridge Settlement Clearing, LLC (8144)(Case No. 20-10012); (v) Liberty Bridge Finco LLC (5215)(Case No. 20-10013); (vi) Liberty Bridge Capital Management, L.P. (6434)(Case No. 20-10014); (vii) Diversified Pre-Settlement Portfolio I, a Series of Liberty Bridge Capital Management, L.P. (1925)(Case No. 20-10015); and (viii) Diversified Pre-Settlement Portfolio II, a Series of Liberty Bridge Capital Management, L.P. (1660)(Case No. 20-10016).

11. The Debtors also request that the Court direct the Clerk's Office to enter a notation substantially similar to the following notation on the dockets of each of the Debtors to reflect the joint administration of the cases:

“An order has been entered in this case directing the procedural consolidation and joint administration of the following chapter 7 cases: (i) Liberty Bridge Capital Management GP, LLC (9236)(Case No. 20-10009); (ii) Cash4Cases, Inc. (8244)(Case No. 20-10010); (iii) Liberty Bridge Capital Management IM, LLC (2955)(Case No. 20-10011); (iv) Liberty Bridge Settlement Clearing, LLC (8144)(Case No. 20-10012); (v) Liberty Bridge Finco LLC (5215)(Case No. 20-10013); (vi) Liberty Bridge Capital Management, L.P. (6434)(Case No. 20-10014); (vii) Diversified Pre-Settlement Portfolio I, a Series of Liberty Bridge Capital Management, L.P. (1925)(Case No. 20-10015); and (viii) Diversified Pre-Settlement Portfolio II, a Series of Liberty Bridge Capital Management, L.P. (1660)(Case No. 20-10016). The docket in the main case, Liberty Bridge Capital Management GP, LLC (Case No. 20-10009) should be consulted for all matters affecting this case.”

NOTICE

12. Notice of this Motion will be given to: (a) the Office of the United States Trustee; (b) counsel for the Debtors’ secured creditors; (c) the twenty largest unsecured creditors of the Debtors; (d) all taxing authority creditors of the Debtors; and (d) all parties requesting notice pursuant to Fed. R. Bankr. P. 2002. In light of the nature of the relief requested, the Debtors submit that such notice is adequate under Bankruptcy Rule 1015 and no other or further notice is required.

[Continued on next page]

WHEREFORE, the Debtors respectfully request that the Court enter an order in substantially the same form as that annexed hereto as Exhibit A: (a) authorizing the joint administration of these chapter 7 cases; and (b) granting such other relief as the Court deems just and proper.

Dated: New York, New York
January 3, 2020

**KLESTADT WINTERS JURELLER
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By: /s/ Sean C. Southard

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